

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

**CHARLES BROWN, MARNIE BROWN,
COURTNEY WELLS, AUSTIN WELLS, B.B.,
a minor, by and through his mother and father
and next friends, Charles Brown and Marnie Brown;
and G.B., a minor, by and through his mother and
father and next friends, Charles Brown and Marnie Brown**

PLAINTIFFS

v.

CIVIL ACTION NO. 3:14-cv197DPJ-FKB

**FORD MOTOR COMPANY, XYZ
Corporations, 1-10**

DEFENDANTS

**FORD MOTOR COMPANY’S MOTION TO EXCLUDE
THE OPINIONS OF MARK SUTHERLAND**

Defendant Ford Motor Company moves to exclude the opinions of Plaintiffs’ Expert Witness, Mark V. Sutherland pursuant to Rule 702, FED.R.EVID. and Daubert v. Merrell Dow Pharm., Inc., 509 U.S. 579, 589 (1993), for reasons set forth in its Memorandum Brief. Ford also relies on the following exhibits.

Exhibit 1:	Plaintiffs’ Designation of Experts
Exhibit 2:	Expert Report of Mark Sutherland
Exhibit 3:	Deposition of Mark Sutherland from Brown v. Ford (instant case)
Exhibit 4:	Plaintiffs’ First Supplemental Designation of Experts
Exhibit 5:	Deposition of Mark Sutherland from Nugent v. Ford
Exhibit 6:	Excerpts from NFPA 921
Exhibit 7:	Expert Report of Mark Hoffman
Exhibit 8:	“Zuno Opinions” – Exhibit 4 to Deposition of Mark Sutherland
Exhibit 9:	Spreadsheet – Exhibit 5 to Deposition of Mark Sutherland

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This 30th day of January, 2015

Respectfully submitted, By Its Attorneys,

MCDONALD TOOLE WIGGINS, P.A.

By: /s/ Scott A. Richman
Scott A. Richman

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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of the filing to all counsel who have registered with the system.

This 30th day of January, 2015.

/s/ Scott A. Richman

Scott A. Richman